IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CARLENE BECHEN, ELVIRA BUMPUS, RONALD BIENDSEIL, LESLIE W. DAVIS, III, BRETT ECKSTEIN, GLORIA ROGERS, RICHARD KRESBACH, ROCHELLE MOORE, AMY RISSEEUW, JUDY ROBSON, JEANNE SANCHEZ-BELL, CECELIA SCHLIEPP, TRAVIS THYSSEN, **CINDY** BARBERA, RON BOONE, VERA BOONE, EVANJELINA CLEERMAN, SHEILA COCHRAN, MAXINE HOUGH, CLARENCE JOHNSON, RICHARD LANGE, and GLADYS MANZANET,

Plaintiffs,

Case No. 11-CV-00562 JPS-DPW-RMD

TAMMY BALDWIN, GWENDOLYNNE MOORE and RONALD KIND,

Intervenor-Plaintiffs,

Members of the Wisconsin Government Accountability Board, each only in his official capacity: MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Government Accountability Board,

Defendants.

F. JAMES SENSENBRENNER, JR., THOMAS E. PETRI, PAUL D. RYAN, JR., REID J. RIBBLE, and SEAN P. DUFFY.

Intervenor-Defendants.

VOCES DE LA FRONTERA, INC., RAMIRO VARA, OLGA VARA, JOSE PEREZ, and ERICA RAMIREZ,

Plaintiffs,

٧.

Case No. 11-CV-1011 JPS-DPW-RMD

Members of the Wisconsin Government Accountability Board, each only in his official capacity: MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Government Accountability Board,

Defendants.

DECLARATION OF DANIEL KELLY IN SUPPORT OF THE DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION TO EXTEND TIME IN WHICH TO MOVE TO COMPEL PRODUCTION OF DOCUMENTS AND TESTIMONY

I, Daniel Kelly, under the penalty of perjury under the laws of the United States of America, declare and state as follows:

- 1. I am one of the attorneys for the defendants, Michael Brennan,
 David Deininger, Gerald Nichol, Thomas Cane, Thomas Barland, Timothy Vocke,
 and Kevin Kennedy (the "Government Accountability Board").
- 2. Last week (on December 22), plaintiffs' counsel requested an extension of time to file discovery motions.
 - 3. All parties immediately agreed to the requested extension.
- 4. Mr. Poland proposed a stipulation to memorialize the parties' agreement. Attached as Exhibit 2001 is a true copy of an email from Mr. Doug Poland attaching his proposed stipulation.
- 5. The Government Accountability Board circulated a revised stipulation that simply stated that all parties had agreed to the requested extension. Attached as Exhibit 2002 is a true copy of my 11:28 a.m., December 23, 2011, email to Doug Poland (and others) attaching the revised stipulation.
- 6. Plaintiffs' counsel rejected the Government Accountability Board's proposed stipulation.
- 7. The Government Accountability Board circulated another draft that left most of plaintiffs' original language, and merely corrected some of their mischaracterizations. Attached as Exhibit 2003 is a true copy of my 5:53 p.m., December 23, 2011, email to Doug Poland (and others) attaching a second revised stipulation.

- 8. Plaintiffs' counsel never explained why neither of the drafts was acceptable, or why it was necessary for the Government Accountability Board to stipulate to their argument or (inaccurate) version of events.
- 9. None of the deposition subpoenas issued in this case so far have required defendants to produce any records, so in the absence of any duty to produce it is impossible for the defendants to have "withheld" any documents.
- 10. Although the Legislature instructed witnesses not to provide certain testimony relating to events leading up to and including the Legislature's adoption of Acts 43 & 44, the defendants raised no such objections.
- 11. The defendants raised no "privilege" objections at any deposition other than that of Mr. Joe Handrick.
- 12. Reinhart Boerner Van Deuren s.c. ("Reinhart") was retained on November 22, 2011, to assist the Attorney General in representing the Government Accountability Board.
- 13. Mr. Handrick is a Reinhart employee who is assisting the attorneys defending this case.
- 14. Although Mr. Handrick previously provided consulting services to the Legislature through its attorneys (Michael Best & Friedrich), Mr. Handrick has provided no such services since at least November 22, 2011.
- 15. Since November 22, 2011, Mr. Handrick's responsibilities, as they relate to redistricting, have been solely to assist the attorneys representing the Government Accountability Board in this case.

- 16. Plaintiffs' counsel never gave any explanation for his repeated and improper attempts, at the deposition of Mr. Joe Handrick, to obtain information protected by the Government Accountability Board's attorney-client privilege or its attorneys' work product.
- 17. Plaintiffs' counsel never explained why he seems to believe it proper to muddle the independent roles of the Legislature and the Executive branches of government with respect to the case at hand.

Executed on this 29th day of December, 2011.

s/ Daniel Kelly___

Daniel Kelly Attorney for Defendants Michael Brennan, David Deininger, Gerald Nichol, Thomas Cane, Thomas Barland, Timothy Vocke, and Kevin Kennedy

REINHART\8176229

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CINDY BARBERA, CARLENE BECHEN, RONALD BIENDSEIL, RON BOONE, VERA BOONE, ELVIRA BUMPUS, EVANJELINA CLEEREMAN, SHEILA COCHRAN, LESLIE W. DAVIS III, BRETT ECKSTEIN, MAXINE HOUGH, CLARENCE JOHNSON, RICHARD KRESBACH, RICHARD LANGE, GLADYS MANZANET, ROCHELLE MOORE, AMY RISSEEUW, JUDY ROBSON, GLORIA ROGERS, JEANNE SANCHEZBELL, CECELIA SCHLIEPP, TRAVIS THYSSEN,

Civil Action File No. 11-CV-562

Plaintiffs,

Three-judge panel 28 U.S.C. § 2284

TAMMY BALDWIN, GWENDOLYNNE MOORE and RONALD KIND,

Intervenor-Plaintiffs,

٧.

Members of the Wisconsin Government Accountability Board, each only in his official capacity:
MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Government Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E. PETRI, PAUL D. RYAN, JR., REID J. RIBBLE, and SEAN P. DUFFY,

Intervenor-Defendants.

(caption continued on next page)

STIPULATION AND ORDER WITH RESPECT TO DISCOVERY

VOCES DE LA FRONTERA, INC., RAMIRO VARA, OLGA WARA, JOSE PEREZ, and ERICA RAMIREZ,

Plaintiffs.

٧.

Case No. 11-CV-1011 JPS-DPW-RMD

Members of the Wisconsin Government Accountability Board, each only in his official capacity:
MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Government Accountability Board,

Defendants.

The parties in this matter, by their undersigned counsel, hereby stipulate and agree to the entry of an order without further proceedings memorializing their limited agreement with respect to discovery and amending, to a limited extent, the corresponding provisions of the Court's "Scheduling and Discovery Order" [Docket No. 35], dated November 14, 2011.

WHEREAS, the parties have exchanged written discovery requests and responded to them, with objections, and the plaintiffs have begun depositions of the defendants' witnesses, beginning with Joseph Handrick on December 20, Adam Foltz on December 21 and Tad Ottman on December 22;

WHEREAS, this Court has entered a series of orders and opinions on issues involving discovery—on November 30, the Court entered an Order denying Plaintiffs' Motion to Compel Disclosure [Docket No. 61]; on December 8, the Court entered an Order denying Non-Parties' Motion to Quash Third-Party Subpoenas issued to Joseph Handrick and Tad Ottman [Docket

No. 74]; and, on December 20, the Court entered an Order granting in part and denying in part, Non-Parties' Motion to Clarify the December 8, 2011 Order [Docket No. 82];

WHEREAS, the defendants and/or the legislature have objected and continue to object to deposition questions posed by plaintiffs' counsel on a variety of grounds and, in that regard, have explicitly directed their witnesses not to answer questions posed by plaintiffs' counsel at deposition;

WHEREAS, the depositions have not been completed;

WHEREAS, the defendants and/or the legislature have withheld from production documents requested in deposition subpoenas served on Joseph Handrick, Adam Foltz, and Tad Ottman, based on the assertion of privilege and in response to plaintiffs' document productions requests;

WHEREAS, the plaintiffs contend that those objections are unwarranted and unsustainable, both in light of the Court's discovery orders and otherwise, leading the plaintiffs to contemplate subsequent motions to enforce the Court's orders;

WHEREAS, the legislature is contemplating appellate remedies, if any, with respect to this Court's discovery orders; and,

WHEREAS, the transcripts of the depositions, which record each of the objections and instructions not to answer, will not be readily available even on an expedited basis in light of the holidays;

NOW, THEREFORE, IT IS HEREBY AGREED that:

1. The plaintiffs need not file any subsequent motions related to discovery until Friday, December 30, 2011;

2. The defendants and/or the legislature shall have until the close of business on Friday, December 30, 2011, to seek and obtain any appellate relief that might be available with respect to the Court's December 20, 2011 order; and,

3. If there is any conflict or inc	3. If there is any conflict or inconsistency between this stipulation and the Court's			
November 14, 2011 Scheduling and Discov	very Order, this stipulation, if entered by the Court as			
n order, shall control.				
Dated: December 22, 2011.	Dated: December, 2011.			
GODFREY & KAHN, S.C.	WISCONSIN ATTORNEY GENERAL			
Douglas M. Poland State Bar No. 1055189 One East Main Street, Suite 500 P.O. Box 2719 Madison, WI 53701-2719 608-257-3911 rmason@gklaw.com	Maria Lazar Assistant Attorney General State Bar No. 17 West Main Street Madison, WI 53703 608-267-3519 lazarms@doj.state.wi.us			
Attorneys for Plaintiffs	Attorneys for Defendants			
Dated: December, 2011.	Dated: December, 2011.			
Thomas L. Shriner, Jr. State Bar No Foley & Lardner LLP 777 East Wisconsin Avenue Milwaukee, WI 53202-5306 414-297-5601 tshriner@foley.com Attorneys for Intervenor-Defendants	P. Scott Hassett State Bar No. Lawton & Cates, S.C. 10 E. Doty Street, Suite 400 P.O. Box 2965 Madison, WI 53701-2965 608-282-6200 shassett@lawtoncates.com Attorneys for Intervenor-Plaintiffs			
Dated: December, 2011.	Dated: December, 2011.			
Peter G. Earle State Bar No. Law Office of Peter Earle, LLC 839 North Jefferson Street, Suite 300 Milwaukee, WI 53202	Eric McLeod State Bar No. Michael Best & Friedrich LLP One South Pinckney Street, Suite 700 Madison, WI 53703			

414-276-1076 peter@earle-law.com Attorneys for Consolidated Plaintiff 608-283-2257 emmcleod@michaelbest.com Attorneys for Wisconsin State Senate and Assembly

ORDER

Based on the representations of counsel, signed above, the stipulated provisions affecting scheduling above shall be entered as the order of this Court.

Dated: December, 2011.	
	BY THE COURT:
	Hon. J.P. Stadtmueller

7264926_1

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CINDY BARBERA, CARLENE BECHEN, RONALD BIENDSEIL, RON BOONE, VERA BOONE, ELVIRA BUMPUS, EVANJELINA CLEEREMAN, SHEILA COCHRAN, LESLIE W. DAVIS III, BRETT ECKSTEIN, MAXINE HOUGH, CLARENCE JOHNSON, RICHARD KRESBACH, RICHARD LANGE, GLADYS MANZANET, ROCHELLE MOORE, AMY RISSEEUW, JUDY ROBSON, GLORIA ROGERS, JEANNE SANCHEZBELL, CECELIA SCHLIEPP, TRAVIS THYSSEN,

Civil Action
File No. 11-CV-562

Plaintiffs,

Three-judge panel 28 U.S.C. § 2284

TAMMY BALDWIN, GWENDOLYNNE MOORE and RONALD KIND,

Intervenor-Plaintiffs,

V.

Members of the Wisconsin Government Accountability Board, each only in his official capacity:
MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Government Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E. PETRI, PAUL D. RYAN, JR., REID J. RIBBLE, and SEAN P. DUFFY,

Intervenor-Defendants.

(caption continued on next page)

STIPULATION AND ORDER WITH RESPECT TO DISCOVERY



VOCES DE LA FRONTERA, INC., RAMIRO VARA, OLGA WARA, JOSE PEREZ, and ERICA RAMIREZ,

Plaintiffs.

٧.

Case No. 11-CV-1011 JPS-DPW-RMD

Members of the Wisconsin Government Accountability Board, each only in his official capacity:
MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Government Accountability Board,

Defendants.

The parties in this matter, by their undersigned counsel, hereby stipulate and agree to the entry of an order without further proceedings memorializing the following their limited agreement with respect to discovery and amending, to a limited extent, the corresponding provisions of the Court's "Scheduling and Discovery Order" [Docket No. 35], dated November 14, 2011:-

WHEREAS, the parties have exchanged written discovery requests and responded to them, with objections, and the plaintiffs have begun depositions of the defendants' witnesses: beginning with Joseph Handrick on December 20, Adam Foltz on December 21 and Tad Ottman on December 22:

WHEREAS, this Court has entered a series of orders and opinions on issues involving discovery—on November 30, the Court entered an Order denying Plaintiffs' Motion to Compel Disclosure [Docket No. 61]; on December 8, the Court entered an Order denying Non-Parties' Motion to Quash Third Party Subpoenas issued to Joseph Handrick and Tad Ottman [Docket]

No. 71]; and, on December 20, the Court entered an Order granting in part and denying in part, Non-Parties' Motion to Clarify the December 8, 2011 Order [Docket No. 82];

WHEREAS, the defendants and/or the legislature have objected and continue to object to deposition questions posed by plaintiffs' counsel on a variety of grounds and, in that regard. have explicitly directed their witnesses not to answer questions posed by plaintiffs' counsel at deposition;

WHEREAS, the depositions have not been completed:

WHEREAS, the defendants and/or the legislature have withheld from production documents requested in deposition subpoenss served on Joseph Handrick. Adam Foliz, and Fad Ottman, based on the assertion of privilege and in response to plaintiffs' document productions requests;

WHEREAS, the plaintiffs contend that those objections are unwarranted and unsustainable, both in light of the Court's discovery orders and otherwise, leading the plaintiffs to contemplate subsequent motions to enforce the Court's orders;

WHEREAS: the legislature is contemplating appellate remedies. if any: with respect to this Court's discovery orders; and.

WHEREAS, the transcripts of the depositions, which record each of the objections and instructions not to answer, will not be readily available even on an expedited basis in light of the holidays;

NOW, THEREFORE, IT IS HEREBY AGREED that:

1. The plaintiffs need not file any subsequent motions related to discovery until Friday, December 30, 2011;

2. The de	fendants and/or the le	gislature shall have until the close of business on
Friday, December 30,	2011, to seek and obt	ain any appellate relief that might be available with
respect to the Court's	December 20, 2011 o	rder; and,
3. If there	is any conflict or inc	onsistency between this stipulation and the Court's
November 14, 2011 S	cheduling and Discov	ery Order, this stipulation, if entered by the Court as
an order, shall control	•	
Dated: December 22,	2011.	Dated: December, 2011.
GODFREY & KAHN	ı, S.C.	WISCONSIN ATTORNEY GENERAL
Douglas M. Poland State Bar No. 105518 One East Main Street, P.O. Box 2719 Madison, WI 53701- 608-257-3911 rmason@gklaw.com	, Suite 500	Maria Lazar Assistant Attorney General State Bar No. 17 West Main Street Madison, WI 53703 608-267-3519 lazarms@doj.state.wi.us
Attorneys for Plaintiff	rs	Attorneys for Defendants
Dated: December	, 2011.	Dated: December, 2011.
Thomas L. Shriner, Jr. State Bar No. Foley & Lardner LLP 777 East Wisconsin A Milwaukee, WI 5320: 414-297-5601 tshriner@foley.com Attorneys for Interven	Avenue 2-5306	P. Scott Hassett State Bar No. Lawton & Cates, S.C. 10 E. Doty Street, Suite 400 P.O. Box 2965 Madison, WI 53701-2965 608-282-6200 shassett@lawtoncates.com Attorneys for Intervenor-Plaintiffs
Dated: December	, 2011.	Dated: December, 2011.
Peter G. Earle State Bar No.		Eric McLeod State Bar No

Law Office of Peter Earle, LLC

Milwaukee, WI 53202

839 North Jefferson Street, Suite 300

Michael Best & Friedrich LLP

Madison, WI 53703

One South Pinckney Street, Suite 700

414-276-1076 peter@earle-law.com Attorneys for Consolidated Plaintiff 608-283-2257 emmcleod@michaelbest.com Attorneys for Wisconsin State Senate and Assembly

ORDER

Based on the representations of counsel, signed above, the stipulated provisions affecting scheduling above shall be entered as the order of this Court.

Dated: December, 2011.	
	BY THE COURT:
	Hon. J.P. Stadtmueller

7264926_1

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CINDY BARBERA, CARLENE BECHEN, RONALD BIENDSEIL, RON BOONE, VERA BOONE, ELVIRA BUMPUS, EVANJELINA CLEEREMAN, SHEILA COCHRAN, LESLIE W. DAVIS III, BRETT ECKSTEIN, MAXINE HOUGH, CLARENCE JOHNSON, RICHARD KRESBACH, RICHARD LANGE, GLADYS MANZANET, ROCHELLE MOORE, AMY RISSEEUW, JUDY ROBSON, GLORIA ROGERS, JEANNE SANCHEZBELL, CECELIA SCHLIEPP, TRAVIS THYSSEN,

Civil Action
File No. 11-CV-562

Plaintiffs,

Three-judge panel 28 U.S.C. § 2284

TAMMY BALDWIN, GWENDOLYNNE MOORE and RONALD KIND,

Intervenor-Plaintiffs,

٧.

Members of the Wisconsin Government Accountability Board, each only in his official capacity:
MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Government Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E. PETRI, PAUL D. RYAN, JR., REID J. RIBBLE, and SEAN P. DUFFY,

Intervenor-Defendants.

(caption continued on next page)

STIPULATION AND ORDER WITH RESPECT TO DISCOVERY

VOCES DE LA FRONTERA, INC., RAMIRO VARA, OLGA WARA, JOSE PEREZ, and ERICA RAMIREZ,

Plaintiffs.

٧.

Case No. 11-CV-1011 JPS-DPW-RMD

Members of the Wisconsin Government Accountability Board, each only in his official capacity:
MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Government Accountability Board,

Defendants.

The parties in this matter, by their undersigned counsel, hereby stipulate and agree to the entry of an order without further proceedings memorializing their limited agreement with respect to discovery and amending, to a limited extent, the corresponding provisions of the Court's "Scheduling and Discovery Order" [Docket No. 35], dated November 14, 2011.

WHEREAS, the parties have exchanged written discovery requests and responded to them, with objections, and the plaintiffs have begun depositions of non-party witnesses, beginning with Joseph Handrick on December 20, Adam Foltz on December 21 and Tad Ottman on December 22;

WHEREAS, this Court has entered a series of orders and opinions on issues involving discovery—on November 30, the Court entered an Order denying Plaintiffs' Motion to Compel Disclosure [Docket No. 61]; on December 8, the Court entered an Order denying Non-Parties' Motion to Quash Third-Party Subpoenas issued to Joseph Handrick and Tad Ottman [Docket

No. 74]; and, on December 20, the Court entered an Order granting in part and denying in part, Non-Parties' Motion to Clarify the December 8, 2011 Order [Docket No. 82];

WHEREAS, the legislature and/or the defendants have has objected and continues to object to deposition questions posed by plaintiffs' counsel on a variety of grounds and, in that regard, have explicitly instructed the deponents not to answer questions posed by plaintiffs' counsel at deposition;

WHEREAS, plaintiffs' counsel asked deposition questions that inquired into the defendant's privileged communications with their counsel, as well as their counsel's work product, and defendants' counsel instructed the witness not to answer such questions;

<u>WHEREAS</u>, the Court's orders have not addressed the attorney-client privilege or the work product doctrine with respect to the members of the Government Accountability Board, or its Director and General Counsel, and their attorneys;

WHEREAS, the depositions have not been completed;

WHEREAS, the legislature has withheld from production documents requested in deposition subpoenas served on Joseph Handrick, Adam Foltz, and Tad Ottman, based on the assertion of privilege and in response to plaintiffs' document productions requests;

WHEREAS, the plaintiffs contend that the legislature's those-objections are unwarranted and unsustainable, both in light of the Court's discovery orders and otherwise, leading the plaintiffs to contemplate subsequent motions to enforce the Court's orders;

WHEREAS, the defendants do not believe any of the Court's orders address the attorney client privilege or the work product doctrine with respect to the members of the Government Accountability Board, or its Director and General Counsel, with their attorneys:

WHEREAS, the legislature is contemplating appellate remedies, if any, with respect to this Court's discovery orders; and,

WHEREAS, the transcripts of the depositions, which record each of the objections and instructions not to answer, will not be readily available even on an expedited basis in light of the holidays;

NOW, THEREFORE, IT IS HEREBY AGREED that:

- 1. The plaintiffs need not file any subsequent motions related to discovery until Friday, December 30, 2011;
- 2. The legislature shall have until the close of business on Friday, December 30, 2011, to seek and obtain any appellate relief that might be available with respect to the Court's December 20, 2011 order; and,
- 3. If there is any conflict or inconsistency between this stipulation and the Court's November 14, 2011 Scheduling and Discovery Order, this stipulation, if entered by the Court as an order, shall control.

Dated: December ____, 2011.

GODFREY & KAHN, S.C.

Douglas M. Poland
State Bar No. 1055189
One East Main Street, Suite 500
P.O. Box 2719
Madison, WI 53701-2719

Dated: December ____, 2011.

WISCONSIN ATTORNEY GENERAL

Maria Lazar
Assistant Attorney General
State Bar No. 1017150
17 West Main Street
Madison, WI 53703

dpoland@gklaw.com lazarms@doj.state.wi.us

Attorneys for Plaintiffs Attorneys for Defendants

608-257-3911

Dated: December _____, 2011. Dated: December _____, 2011.

FOLEY & LARDNER LLP REINHART BOERNER VAN DEUREN S.C.

608-267-3519

Thomas L. Shriner, Jr.	Daniel Kelly
State Bar No. 1015208	State Bar No. 1001941
777 East Wisconsin Avenue	1000 North Water Street, Suite 1700
Milwaukee, WI 53202-5306	P.O. Box 2965
414-297-5601	Milwaukee, WI 53202
tshriner@foley.com	414-298-8284
Attorneys for Intervenor-Defendants	dkelly@reinhartlaw.com
, ,	Attorneys for Defendants
Dated: December, 2011.	Dated: December, 2011.
LAW OFFICE OF PETER EARLE, LLC	LAWTON & CATES, S.C.
Peter G. Earle	P. Scott Hassett
State Bar No.	State Bar No. 1013921
839 North Jefferson Street, Suite 300	10 E. Doty Street, Suite 400
Milwaukee, WI 53202	P.O. Box 2965
. 414-276-1076	Madison, WI 53701-2965
peter@earle-law.com	608-282-6200
Attorneys for Consolidated Plaintiffs	shassett@lawtoncates.com
Anorneys for Consonation I turnings	Attorneys for Intervenor-Plaintiffs
	Dated: December, 2011.
	Eric McLeod
	State Bar No.
	Michael Best & Friedrich LLP
	One South Pinckney Street, Suite 700
	Madison, WI 53703
	608-283-2257

emmcleod@michaelbest.com

and Assembly

Attorneys for Wisconsin State Senate

ORDER

Based on the representations of counsel, signed above, the stipulated provisions affecting scheduling above shall be entered as the order of this Court.

Dated: December, 2011.	
	BY THE COURT:
	Hon, J.P. Stadtmueller

7264926_2